

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MORGAN ART FOUNDATION LIMITED,

PLAINTIFF,

-AGAINST-

MICHAEL MCKENZIE D/B/A AMERICAN IMAGE  
ART,

DEFENDANT.

Case No. 1:18-cv-04438-AT-BCM

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS the current deadline to disclose affirmative experts and the exchange of affirmative expert reports is February 8, 2022, the deadline to complete disclosure of any rebuttal experts and exchange rebuttal reports is March 1, 2022, and the deadline to complete expert discovery, including expert depositions, is March 22, 2022 (ECF No. 422);

WHEREAS the current deadline to file pre-motion letters regarding summary judgment is May 3, 2022 (ECF No. 422);

WHEREAS the court held a telephonic conference on December 21, 2021, to discuss, among other things, the case schedule; and

WHEREAS the parties agree, subject to the Court's approval, to modifying the current schedule, as stated below, to extend the close of expert discovery and summary judgment deadlines until a reasonable time after the conclusion of the hearing on sanctions.

IT IS THEREFORE STIPULATED AND AGREED that the present expert discovery and summary judgment deadlines be modified and extended as follows:

1. The deadline for the disclosure of affirmative experts and the exchange of affirmative expert reports is extended to April 5, 2022;

2. The deadline for the disclosure of any rebuttal experts and the exchange of rebuttal reports is extended to April 26, 2022;
3. The deadline to complete expert discovery, including expert depositions, is extended to May 17, 2022; and
4. The deadline to file pre-motion letters regarding summary judgment, which shall conform to the individual practices of Judge Torres, is extended to June 28, 2022.

Dated: New York, New York

December 27, 2021

QUINN EMANUEL URQUHART & SULLIVAN LLP

By: /s/ Luke Nikas

Luke Nikas

Maaren A. Shah

Ryan Rakower

51 Madison Avenue, 22nd Floor

New York, New York 10010-1601

Telephone: (212) 849 7000

*Attorneys for Morgan Art Foundation Limited*

MARKHAM READ ZERNER LLC

By: /s/ Bridget A. Zerner

John J.E. Markham

Bridget A. Zerner

1 Commercial Wharf West

Boston, MA 02110

(617) 523-6329

jmarkham@markhamreadzerner.com

bzerner@markhamreadzerner.com

*Attorneys for Michael McKenzie d/b/a  
American Image Art*

SO ORDERED.

\_\_\_\_\_  
BARBARA MOSES  
United States Magistrate Judge